



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Bureau of Competition
Health Care Division

December 8, 2021

The Honorable Denise Cote
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1910
New York, NY 10007

Re: *FTC, et al. v. Vyera Pharmaceuticals, LLC, et al.*, 1:20-cv-00706 (DLC)

Dear Judge Cote:

The Federal Trade Commission respectfully requests permission to file under seal Exhibit A to our letter about the proposed redactions to the written testimony of Sheldon Bradshaw. Exhibit A is the affidavit constituting Bradshaw's direct testimony.


Plaintiffs seek to file Exhibit A under seal because it reveals information that is subject to several pending motions to seal. ECF 726, 728, and 750. Upon resolution of those three motions, Plaintiffs will promptly file a redacted version of Bradshaw's affidavit consistent with the Court's ruling. Now, in accordance with Rule 7.B of Your Honor's Individual Practices in Civil Cases and with the requirements for electronically filing under seal, the FTC will publicly file Plaintiffs' letter and a slip sheet of Exhibit A. On a separate docket entry, the FTC will file under seal Plaintiffs' letter and Exhibit A.

Sincerely,

/s/ Markus H. Meier
Assistant Director

Granted.

Dated: December 9, 2021



DENISE COTE
United States District Judge